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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JONAH AMSEL; JULIO RIVERA; and,)
EDUARDO MALTMAN,)
)
Plaintiffs,)
)
vs.)
)
DOUGLAS G. GERRARD; DOLORES)
ELIADES; and, ARISTOTELIS ELIADES;)
DOES I through X; and, ROES I through X')
inclusive,)
Defendants.)

Case No.: 2:16-cv-00999-RFB-GWF

**STIPULATION AND [PROPOSED]
ORDER FOR EXTENSION OF TIME
FOR PLAINTIFFS TO REPLY TO
DEFENDANT ARISTOTELIS
ELIADES' OPPOSITION TO MOTION
FOR SUMMARY JUDGMENT (ECF
NOS. 153, 164)**

[FIRST REQUEST]

Pursuant to Local Rules IA 6-1, LR IA 6-2, and LR 7-1, Plaintiffs JONAH AMSEL, JULIO RIVERA, and EDUARDO MALTMAN ("Plaintiffs"), by and through their undersigned counsel, James P. Kemp, Esq. and Victoria L. Neal, Esq., of the law firm of Kemp & Kemp, and Defendant ARISTOTELIS ELIADES ("Defendant"), by and through his undersigned counsel, Gregory A. Miles, Esq., of the law firm of Royal and Miles, hereby stipulate, subject to approval by the Court, to extend the time for Plaintiffs to Reply to Defendant Aristotelis Eliades' Opposition to Motion For Summary Judgment.

...

1 This is the first request for an extension of time for Plaintiffs to Reply to Defendant
2 Aristotelis Eliades' Opposition to Motion for Summary Judgement. This request is sought in
3 good faith and not for purposes of undue delay.

4 **I. REASON FOR REQUEST**

5 The extension is necessary because of Plaintiffs' counsels' extremely heavy workload
6 This includes, but is not limited to, having to oppose three summary judgment motions, and two
7 joinders, in this matter (due November 16, 2017), an opening brief for the Ninth Circuit Court of
8 Appeals, an opening brief for the Nevada Supreme Court, preparation for and conducting two all
9 day depositions including those of 30(b)(6) witnesses, drafting of a summary judgment motion,
10 and preparation for and attending four worker's compensation hearings. This does not include
11 Plaintiffs' counsel conducting their normal course of business including meeting with clients and
12 potential clients, meet and confers with opposing counsel, propounding and responding to
13 discovery, and witness and expert interviews.

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Therefore, the parties agree that an extension of time is appropriate and stipulate that Plaintiffs have up to and including November 30, 2017, in which to Reply to Defendant Aristotelis Eliades' Opposition to Motion For Summary Judgment.

Respectfully submitted,

Dated this 30th day of October, 2017.

Dated this 30th day October, 2017.

/s/ Gregory A. Mills
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/s/ Victoria L. Neal
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ORDER

IT IS SO ORDERED:

Dated: November 1, 2017.


UNITED STATES DISTRICT COURT JUDGE
HONORABLE RICHARD F. BOULWARE

CERTIFICATE OF SERVICE

This is to certify on the date indicated below the within and foregoing document was served via the court's CM/ECF system to the following persons or parties:

All Parties Registered
Through the CM/ECF system.

Dated this 30th day October, 2017.

/s/ Victoria L. Neal
VICTORIA L. NEAL, ESQ.